

1 THE HONORABLE MARSHA J. PECHMAN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 (SEATTLE)

13 CENTER FOR BIOLOGICAL DIVERSITY,
14 *et al.*,

15 Plaintiffs,

16 v.

17 NATIONAL MARINE FISHERIES
18 SERVICE, *et al.*;

19 Federal Defendants,

20 and

21 PACIFIC COAST FEDERATION OF
22 FISHERMEN'S ASSOCIATIONS, *et al.*,

23 Defendant-Intervenors.

24 CASE NO. 2:19-cv-00487-MJP

25 **STIPULATED MOTION FOR
EXTENSION OF TIME**

26 **NOTE ON MOTION CALENDAR:
July 17, 2020**

27 The National Marine Fisheries Service (“NMFS”), Regional Administrator for NMFS
28 West Coast Region, and the Secretary of the Department of Commerce (collectively, “Federal

1 Defendants"); the Center for Biological Diversity and Wild Fish Conservancy ("Plaintiffs"); and
2 Pacific Coast Federation of Fishermen's Associations and Coastal Trollers Association
3 ("Defendant-Intervenors") move under Local Rule 10(g) for an extension of time on forthcoming
4 deadlines.

5 1. At the July 13, 2020, case management conference with the Court, the parties
6 indicated that they were working on an alternative that could avoid litigating the merits of this
7 case. It appears that the parties have reached a resolution in principle and intend to file a motion
8 to stay proceedings next week.

9 2. There are a number of forthcoming deadlines in the immediate future that will
10 require filings before the Court can evaluate any motion to stay. For example, Federal
11 Defendants are required to file their administrative record and responsive pleading on July 20,
12 2020. Plaintiffs would be required to file a motion contesting the scope of the administrative
13 record by August 3, 2020, and Federal Defendants would be required to file a response to that
14 motion on August 14, 2020.
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16 3. The parties believe it would be more efficient to extend those deadlines while the
17 parties finalize their discussions and the Court evaluates the intended motion to stay proceedings.
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19 4. Thus, the parties stipulate and seek an extension of time for the following
20 deadlines:
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22 Federal Defendants' Administrative Record and Responsive Pleading: August 10, 2020;
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24 Plaintiffs' Motion Contesting the Administrative Record: August 24, 2020;
25
26 Federal Defendants' Response to Plaintiffs Administrative Record Motion: October 4,
27 2020.
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1 5. These short extensions will allow the parties to complete their discussions and if
2 successful, file a motion thereby allowing the Court to evaluate the merits of that motion.
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4 IT IS SO ORDERED,

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7 THE HONORABLE MARSHA J. PECHMAN
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10 Dated: July 20, 2020.

11 Respectfully Submitted,
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14 Deputy Assistant Attorney General
15 U.S. Department of Justice
16 Environment & Natural Resources Division
17 SETH M. BARSKY, Chief
18 MEREDITH FLAX, Assistant Chief
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13 **CERTIFICATE OF SERVICE**
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15 I certify that the foregoing will be electronically filed with the Court's electronic filing
16 system, which will generate automatic service upon all Parties enrolled to receive such notice.
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18 /s/ Coby Howell
19 Coby Howell
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